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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF OREGON

12 In re

13 Van's Aircraft, Inc.,

14 Debtor.

Case No. 23-62260-dwh11

**DEBTOR'S MOTION FOR
EXTENSION OF TIME TO FILE
SCHEDULES AND STATEMENT OF
FINANCIAL AFFAIRS**

***EXPEDITED CONSIDERATION
REQUESTED***

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18 Van's Aircraft, Inc. ("Debtor") respectfully requests an extension of time within which to
19 file its Schedules and Statement of Financial Affairs, and in support thereof states as follows:

20 1. On December 4, 2023 (the "Petition Date"), Debtor filed a voluntary petition for
21 relief under Subchapter V of Chapter 11 of Title 11 of the United States Code.

22 2. Debtor has continued in possession of its property and is continuing to operate
23 and manage its business as debtor-in-possession pursuant to Sections 1107(a) and 1108 of
24 Title 11 of the United States Code.

25 3. No request has been made for the appointment of a trustee or examiner. A
26 committee of unsecured creditors has not been appointed in Debtor's case. Debtor's case is a

1 Subchapter V case, and Kenneth S. Eiler was appointed as Subchapter V Trustee on December 5,
2 2023.

3 4. Debtor's Schedules and Statement of Financial Affairs are currently due on
4 December 18, 2023. Debtor has been and continues to work diligently on accurately completing
5 the Schedules and Statement of Financial Affairs. Debtor requests a four-day extension to
6 December 22, 2023, to complete the Schedules and Statement of Financial Affairs. This
7 extension should not cause any prejudice to any party. A copy of Debtor's proposed Order is
8 attached as **Exhibit 1**.

9 WHEREFORE, Debtor respectfully requests that it be granted an extension of time
10 through December 22, 2023, within which to file its Schedules and Statement of Financial
11 Affairs.

12 DATED: December 18, 2023.

13 TONKON TORP LLP

14
15 By /s/ Timothy J. Conway

16 Timothy J. Conway, OSB No. 851752
17 Michael W. Fletcher, OSB No. 010448
18 Ava Schoen, OSB No. 044072
19 Attorneys for Debtor
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EXHIBIT 1

Proposed Form of Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**ORDER GRANTING DEBTOR'S
MOTION FOR EXTENSION OF TIME
TO FILE SCHEDULES AND
STATEMENT OF FINANCIAL
AFFAIRS**

THIS MATTER having come before the Court on Debtor's Motion for Extension of Time to File Schedules and Statement of Financial Affairs (ECF No. __) (the "Motion"), and the Court being duly advised in the premises and finding good cause; now, therefore,

IT IS HEREBY ORDERED that:

1. Debtor is granted an extension of time through December 22, 2023, within which to file its Schedules and Statement of Financial Affairs.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By _____
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